



Air Quality Permitting Statement of Basis

April 16, 2004

Tier I Operating Permit No. T1-030134

Chilco Lake Lumber Company, LLC, Sandpoint

Facility ID No. 017-00003

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Final Tier I Operating Permit Administrative Permit Amendment

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Acronyms, Units, and Chemical Nomenclatures

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
CO	carbon monoxide
DEQ	Department of Environmental Quality
HAPs	Hazardous Air Pollutants
IDAPA	A numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/hr	pound per hour
m	meter(s)
MACT	Maximum Achievable Control Technology
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate Matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	Permit to Construct
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
SIP	State Implementation Plan
SO ₂	sulfur dioxide
T/yr	Tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

1. PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01.300, *Rules for the Control of Air Pollution in Idaho*, for issuing Tier 1 operating permits.

2. PROJECT DESCRIPTION

On October 1, 2003, Chilco Lake Lumber Company, LLC (Chilco Lake) informed DEQ in writing of the purchase of the existing wood products manufacturing facility in Sandpoint from the Louisiana-Pacific Corporation (LP). Chilco Lake requests that DEQ administratively amend Tier I Operating Permit No. T1-020126, issued to LP on March 26, 2003, to reflect the facility's change in ownership and facility's name change. No other change to the permit was requested by Chilco Lake. This administrative amendment does not result in the increase of any regulated air pollutant.

3. FACILITY DESCRIPTION

The facility is a planer mill that produces kiln-dried lumber.

4. SUMMARY OF EVENTS

October 1, 2003	DEQ received an application from Chilco Lake
January 14, 2004	DEQ determines the application complete

5. TECHNICAL ANALYSIS

Emission Estimates

Emissions are not increasing as a result of this administrative amendment.

Modeling

Emissions are not increasing as a result of this administrative amendment; therefore, an ambient modeling analysis was not required.

Facility Classification

This facility is a major facility as defined by IDAPA 58.01.01.008.10 because it emits or has the potential to emit a regulated air pollutant in amounts greater than or equal to 100 T/yr. The facility is an existing PSD major facility as defined by IDAPA 58.01.01.205 because it emits or has the potential to emit a regulated air pollutant in amounts greater than or equal to 250 T/yr. The facility SIC code is 2421 and the AIRS facility classification is A.

Area Classification

The facility is located in Sandpoint, which is located in Bonner County. Bonner County is located in AQCR 63 and in Universal Transverse Mercator Zone 11. Sandpoint is classified as nonattainment for PM₁₀ and attainment or unclassifiable for all other federal and state criteria air pollutants. There are no Class I areas within 10 km of the facility.

6. REGULATORY REQUIREMENTS

Regulatory Review

The following rules were reviewed in this analysis:

IDAPA 58.01.01.381 *Administrative Permit Amendments*

This permitting action administratively amends Tier I Operating Permit No. T1-020126 to reflect a change in ownership and facility name change. This administrative permit amendment does not require public notice, affected states review, or EPA review in accordance with IDAPA 58.01.01.381.02.c. The administratively amended permit is being issued as Tier I Operating Permit No. T1-030134.

7. AIRS INFORMATION

Table 7.1 AIRS/AFS^a FACILITY-WIDE CLASSIFICATION^b DATA ENTRY FORM

AIR PROGRAM	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	TITLE V	AREA CLASSIFICATION A – Attainment U – Unclassifiable N – Nonattainment
POLLUTANT							
SO ₂	B					B	U
NO _x	B					B	U
CO	A	A				A	U
PM ₁₀	B					B	N
PT (Particulate)	B					B	U
VOC	A					A	U
THAP (Total HAPs)	B					B	
			APPLICABLE SUBPART				

^a Aerometric Information Retrieval System (AIRS) Facility Subsystem (AFS)

^b AIRS/AFS Classification Codes:

- A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For NESHAP only, class "A" is applied to each pollutant which is below the 10 T/yr threshold, but which contributes to a plant total in excess of 25 T/yr of all NESHAP pollutants.
- SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.
- B = Actual and potential emissions below all applicable major source thresholds.
- C = Class is unknown.
- ND = Major source thresholds are not defined (e.g., radionuclides).

8. FEES

The facility is a major facility as defined by IDAPA 58.01.01.008.10, and is therefore subject to registration and registration fees in accordance with IDAPA 58.01.01.387

9. RECOMMENDATION

Based on the Tier I application and review of state rules and federal regulation, staff recommends that DEQ issue final Tier I Operating Permit No. T1- 030134 to Chilco Lake Lumber Company LLC for its Sandpoint facility.

ABC/sd

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